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July 16, 1999

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Re: CC Docket 92-105: In the Matter of the Petition of United States Department of Transportation for Assignment of an Abbreviated Dialing Code (N11) to Access Intelligent Transportation Systems (ITS) Services Nationwide. NSD-L-99-24.

The Southwestern Pennsylvania Commission (SPC) supports the proposal for a standard nationwide N11 dialing code for transportation and traveler information purposes. The preferred access that this service provides would greatly assist in making fragmented transportation information readily available to the traveling public.

SPC is the Metropolitan Planning Organization (MPO) and Local Development District (LDD) for southwestern Pennsylvania. Approximately half of the region's 2.6 million people live in the urban core centered around the City of Pittsburgh. The surrounding counties, while predominately rural, have significant economic ties to Pittsburgh including often-significant percentages of downtown commuters. Pittsburgh is also a regional freight and transit center. SPC, an intergovernmental partnership responsible for planning the region's major transportation facilities, recognizes that we must anticipate increasing traffic congestion because we cannot build sufficient highway capacity to serve the growing needs of the traveling public. The importance to the national and local economy of effectively managing this transportation growth can hardly be overstated -- recent studies show that about 18% of Gross National Product is tied to transportation costs. Intelligent Transportation System (ITS) strategies, including Advanced Traveler Information Systems (ATIS) with the proposed preferred access of an N11 dialing code, are an important means of addressing capacity limits and better serving the traveling public. Over time, the growth in value of an N11 dialing code for transportation will parallel the expected growth in traffic congestion.

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Although SPC does not yet have the capacity to disseminate real-time traffic information, a regional ITS plan that includes ATIS is now being developed. Currently, the region includes two telephone area codes, multiple telephone service providers, three autonomous districts within the state department of transportation, seven transit companies, nine counties, the Pennsylvania Turnpike Commission and various other transportation providers with independent customer information services. The state DOT, two transit authorities, the Turnpike, the City of Pittsburgh and several of the more than 500 local municipal governments have separate traffic management or operations centers. A private company will soon operate an additional system networking traffic surveillance sensors on 100 congested highway segments serving commuters into downtown Pittsburgh. Many of these agencies are expressing a willingness to coordinate traveler information activities through a regional ATIS.

A recognized national N11 code for transportation should simplify development and marketing of the local ATIS system. For situations such as the Pittsburgh MPO, where coordinated systems are only now on the drawing boards, the official "sanction" of an N11 transportation number and its attraction as a customer convenience are incentives in overcoming transportation providers' concerns about working with "competing" agencies or changing customer service practices. The development "learning curve" will not be as steep (or expensive) as design, software and hardware issues become routine. Successful N11 programs in other cities will be completed and publicized before the Pittsburgh ATIS, with spill-over benefits for the local system. Costs for marketing and public education will be minimized as the national standard becomes "public knowledge."

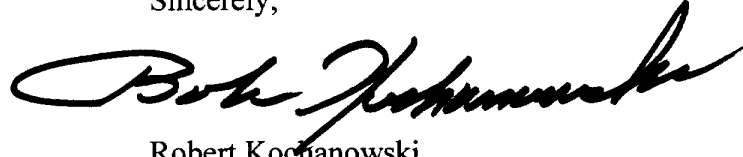
The main benefits, however, are to the individual user, who will have a new, convenient, easy-to-use tool for making informed trip-making decisions. In better serving their own travel need, many users will also provide a real benefit to the remaining traveling public by reducing stress on the overall system. N11-type service is user-friendly, providing a single, easy-to-remember, abbreviated access code through the most widely-used communications medium. A national N11 should also facilitate standard-based customer interfaces for improved ease-of-use while virtually guaranteeing one-stop convenience for multiple travel information services. One number, no hassle, wherever you go, is a clear improvement even compared to a single, memorable, well-publicized seven-digit number. N11 and ATIS are integral parts of the same public trip-making tool.

Peak traffic congestion conditions will diminish as people choose real-time alternatives to avoid sitting in a gridlocked traffic corridor. N11 will increase customer familiarity, acceptance, and convenient use of ATIS, which will decrease travel time, decrease gasoline consumption, decrease air pollution, and encourage alternatives to single-occupant vehicle travel. Access by non-residents to local social and cultural opportunities will increase as well, as visitors gain easy access to local travel information.

Ms. Magalie Roman Salas
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Designating a N11 dialing code for transportation would serve both as a visible symbol of the public need for integrated travel information as well as (when integrated with ATIS) the most powerful tool available for accomplishing that purpose. Approval of the U.S. DOT petition and public stewardship of an N11 dialing code by our intergovernmental transportation team is a wise and effective use of this valuable public resource.

Sincerely,

A handwritten signature in black ink, appearing to read "Bob Kochanowski", written in a cursive style.

Robert Kochanowski
Executive Director

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